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As an Animal ID Specialist with RMS Research Management Systems USA, Inc. I would like to express my concerns on the movement to a privatized system for animal tracking as part of USDA, APHIS, VS's National Animal Identification System. It may seem like a contradiction that a State with a private company managing NAIS efforts is against the USDA moving into a private public partnership. However, if you look at what Colorado has done and what the USDA is proposing the differences start right at the beginning. In the state of Colorado the decision was made, from the start, to utilize a private company for NAIS and state animal health needs. The company is not working on just animal tracking but is also responsible for premises registration, AIN management, education efforts, technology review and other issues surrounding animal health. In comparison, the USDA has chosen, after releasing a draft proposal stating otherwise, to utilize a private company for animal tracking alone. I am not against the use of public private partnerships but against the road USDA has chosen to get to this point.

My experience, working with the Colorado Department of Agriculture and Colorado Brand Board, makes me knowledgeable in the fact that animal tracking is, quite easily, the most difficult and most costly part of the NAIS to construct and make functional. I also know that this can be the most controversial portion of NAIS with a significant number of livestock industry members wanting to be involved for their own personal gains. Therefore, it troubles me a great deal that the USDA has taken such a side stepping approach to the animal-tracking portion of NAIS. In fact I am embarrassed that you have deviated from original plans and species working group recommendations, only to follow the route of very vocal industry organizations. I recognize that these organizations are as reputable as they are vocal, however this has and should remain an ANIMAL HEALTH system, which means if NAIS is to follow an organization it should be one based on animal health and scientific thought, not a single species and political or pocket book ambitions.

It is not my intention to fight the system or changes that may happen, I do value and support the need to have private entities involved in the NAIS but I stand strong in my belief that this should have occurred from the beginning and should be an all or nothing situation. The concept of USDA building portions of the system and then private building other portions not only seems duplicative, but brings about a considerable amount of confusion on who is responsible for what. Even when systems are governmentally held and they cross into a separate jurisdiction we run into considerable operational issues (Example, APHIS vs FSIS). Since this is being built to aid animal health issues and in particular emergency response to a highly contagious disease we, as a nation, do not have room for conflict or operational difficulty.

While I am not able to speak for all of Colorado, I have been in touch with a significant proportion of animal industry from producers to animal health officials and they have all expressed concerns that a move to a private entity is not good at this point in time. Some believe it will decrease the effectiveness and ability to regulate or it may increase confidentiality and speed of implementation but most if not all believe it will increase the cost to the producer with no increased benefit. This causes myself, on the implementation side, great concern as I am fearful that after a year of turning producer concerns from hostile to interested I will again be facing a hostile group, which must now be turned again by a different message as we ask for participation and trust. Producers have already been challenging us by saying, "Make it mandatory and then I will think about it." Now they can add, "I know it is mandatory but what are you going to do about it." Which now sounds like we will not have a reply, at least not at the federal level.

Marketing benefits seem to be a common topic of discussion and while I believe these benefits need to become a reality, I feel the system will only be reputable throughout the world if it is government based. Along the same line of thought, it is agreed that there should be charges and profits on marketing aspects that can be layered on top of a solid NAIS infrastructure. Still, that solid NAIS infrastructure must be in the form of a system to protect and maintain National Animal Health. National animal health is a public concern, even potentially a public HEALTH concern, in light of avian influenza; this means it should be

supported by public funds. Is the move to a private “portal” simply a way to cut budgets and not financially support a program that our Secretary of Agriculture said would happen?

If the decision is to continue to pursue a private entity as a central access point for the USDA, I suggest funds are not discontinued to States for animal tracking. While the private system may find a way to support themselves, it is doubtful they will be able to provide enough financial support to all states and tribes. The result will be a poorly functioning animal ID system that costs producers more and will continue to give American Agriculture the stigma of “corporate agriculture” and the perceived evils that follow the production format.

In revisiting the duplication of effort factor, which USDA has repeatedly said they want to avoid, it has been mentioned that the USDA will still be responsible for PIN management and AIN management all the way to the first premises. This means that the USDA will have to create a database and system capable of storing all information that is necessary for animal tracking, then have a private entity do the same. USDA already has a system built, why don't we determine if it will work before creating a new one that we do not know if it will work, cost more money, have less credit across the world and potentially bring about great resistance amongst producers as they ask “Is this really going to happen or is this another government program gone bad.”

In summary, while movement was slow and there was still significant work to be done, I felt we were making good progress and finding relevant solutions to NAIS challenges. Now I am concerned if a NAIS will ever become reality. If USDA will not take a lead then I am fearful of whose self interests will be expressed and when, if ever, this issue will emerge from the courtroom to become reality. Finally, who will pay for a system that is keeping livestock health, when these animals carry zoonotic diseases and feed our country? In the aftermaths of hurricane Katrina I would have hoped that the USDA would have learned the need to be properly prepared. Maybe we still can.

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